

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
Case No.: 1:18-CR-00134-KAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DONVILLE INNISS,

Defendant.

DEFENDANT'S NOTICE OF FILING

Defendant, **DONVILLE INNISS**, by and through undersigned counsel, files this Notice of Filing, attached to which he has included eight (8) character letters which have been written on his behalf (Exhibit 1).

Respectfully submitted,

GRAYROBINSON, P.A.

Attorneys for Defendant

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Miami, Florida 33131

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JHirschhorn@gray-robinson.com

By: s/Joel Hirschhorn

JOEL HIRSCHHORN

Florida Bar #104573

Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 9, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

s/Joel Hirschhorn
JOEL HIRSCHHORN

Exhibit 1

5125 Palm Springs Blvd
Unit 2201
Tampa
Florida 33647

March 01, 2021

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn
New York, NY 11201
UNITED STATES OF AMERICA

Re: United States v Donville Inniss, Docket No. 18-Cr-134 (KAM)

Most persons who have reflected and commented on Donville O'Neil Inniss over the past few years and, since his charge, trial, and conviction in the USA, do so from a perspective of his being a Member of Parliament, Cabinet Minister and generally as a public person. However, we write this letter on behalf of our husband and father, Donville Inniss - roles seen by few, but ones that truly reflect his character.

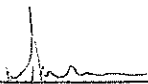
Don (Dad) has always taken his role as husband and father very seriously. He has never failed to work diligently to help provide for the physical, housing, emotional and financial well-being of his family. Despite his remarkably busy work schedule over the past twenty-five years, both in private and public sectors, Dad made quality time to guide our lives. He helped with our schoolwork, attended our social activities, was active in the Parent Teachers Association, was our counsellor and has molded us (sons) into positive and ambitious young men. No matter where he was in the world, we were guaranteed of a call every morning and every evening. He inspired us to see the world as our oyster, to respect all regardless of race, class, religion, or political beliefs.


Dad operated on the basis that it takes a village to raise a child and none of us should seek to live in isolation, oblivious of the plight of others around us and unwilling to help wherever and however we could. We saw firsthand how much he was willing to help others, even if it meant that as a family, we had to make sacrifices.

As a public official representing his constituency and serving in the Cabinet, our home became a place for luncheons, dinners, charity events as he hosted activities that brought together residents from all walks of life to relax, entertain and raise funds for worthwhile community causes.

His trials and tribulations in the USA over the past two years have brought an unprecedented and deep sense of embarrassment, financial burden, and emotional toll on our lives. The harsh public and private comments, threats and scorn are not one that any of us would wish upon another person. However, we rest with the comfort of knowing that our husband and father had committed the last half of his life to caring and sharing with us as a family and with our wider communities. This is buttressed by our fervent wish to be truly united as a family again.

Sincerely,



Gail Williams- Inniss

Kyle S Inniss

Kofi K Inniss

Adriel D. Brathwaite Q.C.

ATTORNEY-AT-LAW

"CHAMBER"
Six Roads, St. Philip,
Barbados, W.I.
Tel: (1-246) 271-1221
Cell: (1-246) 253-0492

E-mail: abrathwaite@horizonchambers.com

15th December 2020

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn
New York, NY 11201
UNITED STATES OF AMERICA

Re: United States v Donville Inniss, Docket No. 18-Cr.-134 (KAM)

Dear Judge Matsumoto,

I am an Attorney-at-Law practicing in Barbados for the last Thirty-four (34) years. I also served as Attorney General of Barbados from 2010 until 2018.

I have known Donville Inniss for Forty-four (44) years. I have full knowledge of the serious criminal matters for which Donville has been convicted.

Donville Inniss and myself have been friends, business partners and professional colleagues during the years that we have known each other.

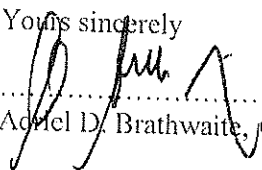
I have found Mr. Inniss to be a generous and socially responsible individual. These qualities have shaped his involvement in several local clubs in Barbados all with an emphasis on community development. It is these said qualities which also lead Mr. Inniss to an involvement in elective politics from the time he was eighteen years old.

In the area of politics Mr. Inniss excelled. As a constituency representative he was second to none in championing the cause of the poor and under privileged, more often than not utilizing his own resources to assist those in his community.

The greatest testimony to the impact that Mr. Inniss has had in his community can be seen in the hundreds of persons known and unknown to me who have stopped me across Barbados requesting that I convey their well wishes and prayers to him.

I unhesitatingly provide this letter of reference on behalf of Mr. Inniss in the hope that in some way it will be a barometer of his kind and generous spirit.

Yours sincerely


Adriel D. Brathwaite, Q.C.

Terrence Devere Inniss
Rices Drive, Rices
ST. Philip, Barbados
Email: tinniss11@gmail.com

26th. February 26, 2021

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn
New York, NY 11201
UNITED STATES OF AMERICA

Re: United States v Donville Inniss, Docket No. 18-Cr.-134 (KAM)

I write this reference on behalf of the siblings of Donville O Inniss. We are aware that he has been convicted of serious federal felony offenses in the USA but have been, and remain, fully supportive of him throughout this ordeal. Such a situation continues to be devastating to us as a family unit.

Donville is the fifth of nine children born to Joseph and Jasmine Inniss. There were seven (7) sons and two (2) daughters. One son died at birth and another in 2018 at age fifty (50) years. We were raised in a typical Barbados working-class rural family where the importance of family, church, education, and community spirit were embedded in each one of us. As a result, we have all strived for success in our respective field of endeavor whilst giving back to our communities. Such value system has extended to our children and grandchildren.

As the middle child, Donville was always well respected among family. In many respects, he has been the glue that has helped to keep the entire family together. He advised family on educational pursuits as well as financial and general matters. Without a doubt, he managed such affairs with ease and with a commanding but genuine and supportive spirit.

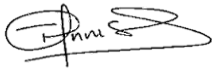
As a family, we were not surprised that Donville ventured into the field of elective politics as he always had a passion for service and national development issues. With his enabling nature, his sharp intellect, his compassion for others and his very forthright nature, Donville's success in politics was immediate and he gained the overwhelming support and respect from his constituents and fellow countrymen.

It is therefore not surprising that he emerged as one of the most engaging and enlightening politicians of his era. His unwavering commitment to his constituents and his scholarly views on matters of international significance were admirable and yielded much success.

From young, Donville has always been a very astute individual. He has consistently expressed his views with candor and clarity of thought, never allowing himself to be influenced by the dictates of his peers. His affable, sociable and humble nature allows him to communicate and interact with persons at all levels.

We hope that this brief reference helps to capture both the public and private persona of our brother, nephew, uncle and brother-in-law as the caring, committed and selfless person that we have known all our lives.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Terrence Inniss', with a stylized flourish at the end.

Terrence Inniss MIB, Dip. Ed, BA(Hons)
Brother

12837 White Bluff Rd
Hudson, FL 34669

1 April 2021

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn
New York, NY 11201
UNITED STATES OF AMERICA
Re: United States v Donville Inniss, Docket No. 18-Cr.-134 (KAM)

Dear Judge Matsumoto,

I retired from Alliant Techsystems (now Orbital Systems) in 2011, after 35 years of service; I am a former Director of Accounting and Financial Administration; I was responsible for many classified programs for the US Department of Defense and both direct and Foreign Military Sales to foreign governments.

I am the past President/Founder of the Barbados Association of Tampa Bay (BAOTB); the mission of the BAOTB, under my leadership, was to support cancer patients and their families in Barbados and in the Tampa bay area. Donville's encouragement and advice was instructive and instrumental in helping me to establish the BAOTB to sustain for the first ten (10) years of its operations. He was particularly helpful in identifying private and public sector support for our activities, whilst soliciting members to join the organization. He attended most of our annual events and was instrumental in getting the Prime Minister of Barbados and other senior Government officials to attend and to speak at our fundraising events in the USA.

I am aware of Donville's conviction of three (3) serious federal felonies in the USA. I have known Donville for the past 15 years. He has been a fellow resident in Tampa, Florida and in Barbados, where he served as the elected Parliamentary Representative for the constituency, where my home is located.

Over the years, Donville had used his passion for community development to help us identify vulnerable groups in the Barbados society who benefitted from partnership with our group in the diaspora. He was able to follow through to ensure successful partnerships therein.

As our Parliamentary Representative, Donville was constantly in contact with his constituents and forever working to address their concerns in a sustainable manner. His sincerity and commitment to helping the less fortunate or challenged in our society remains deeply imbedded in our minds and hearts.

Donville is a sincere, community oriented person who thinks of others before himself. I trust that this brief reference gives you some insight into the positive characteristics of Donville O Inniss.

Sincerely,

DocuSigned by:

C9DC2DAF8F7D41B...
Henderson Griffith

Ms. Angela J. Corbin JP (Justice of the Peace)
Durant's Village,
Holders Hill
St. James BB 23010
Barbados

Hon. Klyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn
New York, NY 11201
UNITED STATES OF AMERICA

Re: United States v Donville Inniss, Docket No. 18-Cr.-134 (KAM)

Dear Judge Matsumoto,

I have had the distinct pleasure and honour to have known Donville O Inniss for the past thirty years as a friend, confidante and as an employer.

Between 2008 – 2018, I served as his Personal Assistant. My duties included but were not limited to, facilitating relations with constituents, managing aspects of his public affairs, managing his constituency office, deputizing at constituency events, relations with third parties, political advisor and liaising with Government and private sector to address the needs of his constituents and constituency. These roles allowed me to recognize his character and capacity to work.

As a representative of the people at one of the highest levels in our island, Mr. Inniss was relentless in his pursuit of policies that provided for equality of opportunities, access to affordable health, education, housing and social services, sustainable community development and physical improvements for both residents and community. He cared deeply about each constituent and never saw any concern of theirs as being too insignificant or too big for him to help resolve. He enjoyed the small events like rejoicing in the birth of a baby, celebrating the life of a deceased loved one, attending school graduations, opening community projects and taking part in competitive community events. No call or text message went unreturned or unattended. No cry for help in the middle of the night was left unattended until the next day. No request for assistance was addressed with any concern over the political affiliation of any party involved.

As a Cabinet Minister, he fought without fear or favour for the causes that he believed were most dear to Barbadians and Barbados. At the local, regional, and international levels, Mr. Inniss conducted his work with diligence, determination and commitment. He was well respected by citizens from all walks of life and political stripes and until his unfortunate challenges in the USA, was one of the leading potential future leaders of Barbados.

Having worked so closely with Mr. Inniss, I often engaged with members of the corporate world who saw him as a fair and responsive Minister who championed the causes of private capital without compromising on the rights and opportunities for the masses. He was well supported in his political work in Barbados by a wide cross section of the corporate world. His voice of reason is sorely missed in our island today.

I am fully aware of his charge, trial and conviction in the USA. However, I am equally aware of his sincerity and commitment to his family, his communities, his country of birth and residence and to his general causes. I trust that you may take his profound service to humanity and community into consideration as you deliberate over his fate.

Sincerely,



Angela Corbin JP



Dr. Dale Alphonso Husbands
9121 Lake Fischer Blvd
Gotha, Florida 34734
Cell 407-694-1285
Thursday, February 25, 2021

Hon. Kiya Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Donville Inniss
Docket No. 18-Cr.-134 (KAM)

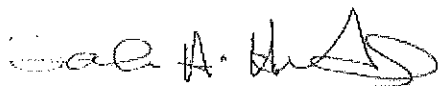
Dear Judge Matsumoto:

My name is Dale Husbands and I am a Professor of Computer Science at Valencia College, Orlando, Florida and President of the Barbados Association of Central Florida. I have known Mr. Donville O Inniss for the past 15 years in his capacity as a member of the Barbados diaspora of middle Florida and as a member of the Cabinet of Barbados. I am aware of the charges and conviction of Mr. Inniss in Federal Court in New York State.

Mr. Inniss has been instrumental in assisting in the development of the Barbados diaspora in middle Florida by bringing members together for social and charitable events, networking, fundraising, and soliciting support from both private and public sectors in Barbados. His passion for community development and care for the less fortunate in society has been deeply reflected in his application to every task assigned in public life. Never once did he hesitate to assist our group or individuals in any way possible. Even in the midst of his legal and Court related matters here in the USA, Mr. Inniss still took the time to attend and participate in our various events and to freely offer advice and counsel to anyone in need.

I unreservedly provide this reference letter in the hope that it would be reflective of the compassionate, kind and sincere character of Donville O Inniss.

Sincerely,



Dale A. Husbands
Professor of Computer Science

#22 Oxnards Heights

St. James

BARBADOS

Tel: 246 424 1929 **E-mail:** maxpammc2018@gmail.com

February 26, 2021

Hon. Kiyo A. Matsumoto
United States District Judge,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
USA

Re: United States v. Donville Inniss
Docket No. 18-Cr.-134 (KAM)

Dear Judge Matsumoto,

I write this letter on behalf of Mr. Donville Inniss. I have known Mr. Inniss for many years, and in multiple capacities. I am Maxine McClean a former Cabinet Colleague of Donville, I was Minister in the Prime Minister's Office and then Minister of Foreign Affairs and Foreign Trade. As a former Lecturer in the Department of Management Studies at the Cave Hill Campus of the University of the West Indies, from 1982 until 1999, I taught Donville in the Executive MBA at the Cave Hill School of Business (previously the Centre for Management Development).

I am aware that Mr. Inniss has been convicted of three serious crimes in the United States, but I would like to share with you the Donville Inniss I know and with whom I worked and socialised.

As is typical in a small country, I came to know that he was related to, or a friend of persons who were part of my childhood neighbourhood and many of

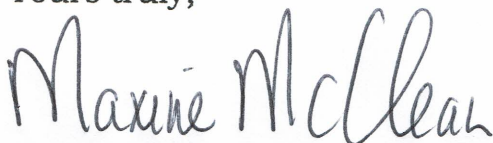
whom went to church with me. We also live in the same neighbourhood, and as such I live in the constituency, St. James South, where he was political representative for 10 years.

In fact I was one of a small group of friends from the neighbourhood who encouraged him to enter politics, based on his general involvement in the community and the assistance he readily offered to many in the poorer areas in the constituency. A very generous individual who understood what it was to be poor and hardworking, over the many years I have known him, he gave freely of his time and his resources.

As my Cabinet colleague I sat next to Donville in most Cabinet meetings and observed, through his actions and contributions that the power associated with the role of Member of Parliament and Minister of Government did not change his fundamental personality, shaped by his humble beginnings.

In public life he exhibited a high level of enthusiasm and often argued the case for those unable to represent themselves. As I travel across this country, I am often asked by Barbadians of all walks of life about him, and to extend their best wishes, many of them recounting personal experiences in which he took the time to assist them in multiple ways. To my mind, these all reinforce my personal knowledge of Donville Inniss, a personal friend of many years, a colleague who gave much as a Politician, and a neighbour who opened his home to the young, the elderly and less fortunate in our community and across Barbados.

Yours truly,

A handwritten signature in dark ink, reading "Maxine McClean". The script is fluid and cursive, with the first name "Maxine" and last name "McClean" clearly distinguishable.

Maxine McClean

Shelley E. Weir MBE MSc

112 1st Ave Pelican
Husbands Gardens
St James Barbados

Telephone: (246) 438-2511
E-mail: hope@caribsurf.com

March 1st, 2021

Hon Kiyo Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Donville Inniss, Docket No. 18-Cr.-134 (KAM)

Dear Judge Matsumoto

I am an NGO Management Specialist by profession trained at the London School of Economics (LSE). My diagnosis of Lupus in 1990 led me to establish, a charity, Hope Foundation in Barbados focusing on the needs of those affected by Lupus, Sickle Cell and Arthritis and I continue to lead this organisation. I have served on the National Focal Group of the United Nations Development Programme- Global Environmental Fund; the Board of Management- Ellerslie Secondary School; the Drug Formulary Committee; the Board of the Queen Elizabeth Hospital (QEH)- Chair of the Patient Care Committee (the first non-medical person to hold this position) and Chair of the Independent Assessors Panel for Living Donor Transplantation.

I have known Donville O Inniss for the past twenty-eight (28) years in both a personal and professional capacity and am also a resident of the constituency of St. James South, which he represented. I am fully aware of his issues with the US Justice system and it is against the background of his conviction that I seek to give expression to the person and character that I have so gladly associated with.

Mr Inniss was a member of Cabinet and served as Minister of Health 2008 – 2013 during which time his directives to the boards that I sat on concentrated on policies and procedures that redounded to better outcomes for patients through a more patient-centred approach. His empathetic and compassionate approach as a Cabinet Minister fueled the typical governmental bureaucracy to explore alternatives for a challenged healthcare system. For example, the QEH the lone tertiary acute care institution on island, was faced with the challenge of having elderly persons literally living in the hospital and therefore restricting access for those in urgent need of care. He was perceptive enough to walk through the system, recognize that those long stay patients would be better served in a geriatric institution and conclude that the only issue preventing their transfer was available beds. He got beds repaired, (some just needed the wheels replaced) and in one weekend was able to have 26 patients transferred therefore freeing up space for otherwise ill patients. In essence, his ability to work across ministries and communicate well with officers resulted in a shared and energetic mission to ease an overwhelmed system.

As a representative, he has left an indelible mark on the constituency in terms of social and community-based programs as well as physical projects. His work with the youth, elderly and other vulnerable groups was outstanding. Mr. Inniss was ever present, attending to the needs of all without fear or favour. He defined himself in a way that few politicians do, he listened, acted and was clearly involved to be of service irrespective of class, colour or creed.

I recall my doctor asking me who supports the supporter? Concern was being expressed at the weight I carried even as a patient, Donville has been that friend that would recognize when I was overwhelmed but not complaining; get into the trenches to ensure that the needs of patients that our mandate identifies were not sacrificed. Equally, he understood that pursuing a quality life was not restricted to diagnosing, prescribing and medical care but the importance of self-esteem and being regarded without the stigma of suffering from a chronic disease.

Whether he hosted patient events at his home, or during fundraising events roll up his sleeves and help serve or just lend his voice to uplift those who were less fortunate he has always been steadfastly selfless and accessible. Even as he faces his own legal challenges in the USA, he has continued to provide guidance and assistance to those in need by way of advice on personal and economic issues.

I therefore unreservedly provide this reference of Mr. Inniss' character and work in the hope that you may get a glimpse of his positive work and influence throughout the years.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Shelley Weir', with a long horizontal flourish extending to the right.

Shelley Weir MBE MSc